

**GIBSON DUNN**

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October 30, 2023

VIA ECF

The Honorable Analisa Torres  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Mehta v. DLA Piper LLP*, Case No. 1:23-cv-04757-AT

Dear Judge Torres:

Pursuant to the Court's June 7, 2023 Initial Pretrial Scheduling Order (ECF No. 4), Plaintiff Anisha Mehta ("Plaintiff") and Defendant DLA Piper LLP (US) ("Defendant") (collectively, the "Parties") respectfully submit this joint letter, addressing the following in separate paragraphs: (1) a brief description of the case, including the factual and legal bases for the claims and defenses, (2) any contemplated motions, and (3) the prospect for settlement. In accordance with the Court's instructions, the Parties are submitting with this joint letter a proposed Case Management Plan and Scheduling Order.

**1. Brief Description of the Case**

Plaintiff is a former employee of Defendant who alleges that her employment was unlawfully terminated due to her pregnancy and request for maternity leave. In her Complaint, Plaintiff asserts claims for pregnancy-based discrimination and retaliation under Title VII of the Civil Rights Act of 1964 (Counts 1–2), the New York State Human Rights Law (Counts 5–6), and the New York City Human Rights Law (Counts 7–8), as well as claims for interference and retaliation under the Family and Medical Leave Act (Counts 3–4). Defendant disputes all of Plaintiff's claims and maintains that she was discharged solely due to her poor work performance.

**2. Contemplated Motions**

Defendant anticipates moving for summary judgment after the close of discovery. All Parties reserve their respective rights to bring additional motions as the action progresses.

**3. Prospect for Settlement**

The Parties participated in the District's Mediation Program on October 16, 2023, but did not reach a resolution. At this time, the Parties do not believe that settlement is possible.

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Respectfully,

s/ Michele L. Maryott  
Michele L. Maryott

s/ Jeanne M. Christensen (on consent)<sup>1</sup>  
Jeanne M. Christensen

cc: Counsel of Record (*by ECF*)

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<sup>1</sup> The parties are using electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.